

**Application of Wisconsin Energy Corporation for Approval to Acquire the
Outstanding Common Stock of Integrys Energy Group, Inc.
PSCW Docket No. 9400-YO-100**

**WEC's Response to
Commission Staff's Eleventh Data Request
Dated: October 31, 2014**

Public Service Commission of Wisconsin
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REQUEST NO. PSCW-11.09:

In its application for approval to acquire Integrys, WEC states, "the headquarters of the post-merger entity and associated jobs will be located in Wisconsin and critical decisions affecting energy policy in Wisconsin will continue to be made in Wisconsin." ([Application - PSC REF#: 213332](#), p. 14). Related to this statement, does WEC agree to accept, uncontested, a Commission acquisition condition ordering that WEC headquarters shall remain in Wisconsin, and any future plans to move the location of the headquarters shall be brought before the Commission for approval?

- a. If no, what is the basis for the rejection of the condition?

RESPONSE:

WEC does not believe that such a condition is necessary. As stated in the Application, "the headquarters of the post-merger entity . . . will be located in Wisconsin." WEC has also consistently stated that corporate headquarters will be in metropolitan Milwaukee, and that operating headquarters will remain in Green Bay, Chicago and Milwaukee. (See, e.g., "Wisconsin Energy to Acquire Integrys Energy Group", produced in response to PSCW 10.27) There are no present plans to move either the corporate or operating headquarters.

WEC Energy Group will continue to operate the combined company prudently and in the best interests of customers, including with respect to the location of its headquarters. As such, no specific order point concerning the location of WEC Energy Group's headquarters is necessary.

Further, we are not aware of any precedent for a Commission order that corporate headquarters be located in Wisconsin. In any event, WEC Energy Group would remain subject to the Wisconsin Holding Company Law.

Answered by: Jim Schubilske